

REMARKS

Applicant has amended claim 66 to properly depend from independent claim 39, thereby realigning the grouping of claims as follows:

- Group I including claims 1-30 and 39-69, and
- Group II including claims 31-38 and 70-79.

Applicant hereby confirms election of realigned Group I for examination.

Claims 1-30 and 39-69 are pending.

Claims 1-4, 6-8, 17-18, 20-23, 25-26, 39-45, 55-61 and 63-65

Claims 1-4, 6-8, 17-18, 20-23, 25-26, 39-45, 55-61 and 63-65 were rejected under §102(e) as being anticipated by Anwar, USP 6,750,864. Applicant respectfully traverses the Examiner's rejections.

Claim 1 requires "identifying a first plurality of regions within a first recursively partitioned/nested geometric structure that correspond to a first plurality of normalized multi-dimensional data of a first normalized multi-dimensional data space ..." (underline added). The objects of the identifying operation are regions within a recursively partitioned/nested geometric structure (hereinafter RPNGS). Applicant, via Figures 2-6 and their corresponding descriptions, has extensively defined the meaning of RPNGS, ***as Applicant is entitled to do under the law, being his own lexicographer***. A RPNGS refers to a geometric structure created by recursively partitioning a geometric primitive, nesting additional smaller geometric primitives within the larger geometric primitive(s) at each nesting level.

Figure 2 illustrates an example RPNGS, created using a line primitive with width, with successive smaller line segments nested within larger line segments of the immediately preceding nesting level. Figure 4 illustrates an example RPNGS, created using a pentagon primitive, with successive smaller pentagons nested with larger pentagon primitives of the immediately preceding nesting level. Figure 6 illustrates an example RPNGS, created using triangle and circle primitives, with

successive smaller circle (triangle) primitives nested with larger triangle (circle) primitives of the immediately preceding nesting level.

Applicant submits a recursively generated tree structure is not a RPNGS, as defined by Applicant. It is a structure comprising of recursively identified subordinated nodes connected to the nodes of the immediately preceding level by branches. The subordinated nodes are not smaller than, nor nested within nodes of the immediately preceding level that are larger.

Accordingly, Applicant submits Anwar's process for generating a pivot tree does not anticipate the required "identifying" operation.

Claim 1 also requires "associating corresponding first visual attributes with said first corresponding regions within said first recursively partitioned/nested geometric structure, based at least in part on corresponding ones of said determined first graphing values". The object of the "associating" operation is associating visual attributes with the regions identified by the "identifying" operation.

Columns 13, lines 6-16 of Anwar merely teaches a 2-D scatter plot that represent data as points in a plane. Each point signifies two values and their relationship to one another. Applicant submits any one skilled in the art would understand the teaching to mean determining the location depicting values (i.e. the x and y coordinates) of the points. In other words, the location of the point conveys the two values. Thus, there is no determining of visual attributes for the points based on their corresponding graphic values, as there are no other values that need to be visually conveyed (beside those two conveyed by the location of the point). Moreover, the points are not elements of a RPNGS.

Similarly, column 16, lines 9-17 merely teaches selecting "two or more dimensions having at least one member, where each dimension and each member has one or more corresponding and selectable numeric values or measures associated therewith, for a star graphics construct. Anwar's star construct is illustrated in detail via its Fig 6, where for the example star construct, one dimension is the "States" (with the members being WA, OR, CA), and another dimension is "Year" (with the members being Q1, Q2, Q3 and Q4). The positions in the 3D space for the various member combinations WA-Q1, WA-Q2 etc are

determined, based on their numeric values or measures. Again, there are no visual attributes being determined, to be associated with these points, other than the values that position the “vertices” in the 3-D space. Even if we are to read the determining of the locations of the “vertices” in the 3-D space is covered by the language of determining visual attributes to be associated, the points in the Anwar’s 3-D star construct are nonetheless, not regions of a RPNGS.

Therefore, Anwar does not anticipate the “associating” element.

Thus, for at least the foregoing reasons, claim 1 is patentable over Anwar.

Claim 39 contains in substance the same limitations as claim 1. Therefore, for at least the same reasons, claim 39 is also patentable over Anwar.

Claims 2-4, 6-8, 17-18, 20-23, 25-26, 40-45, 55-61 and 63-65, depend on either claims 1 or 39, incorporating their limitations correspondingly. Therefore, for at least the same reasons, claims 2-4, 6-8, 17-18, 20-23, 25-26, 40-45, 55-61 and 63-65 are patentable over Anwar.

Rejections against claims 13-16, 24, 51-54 and 62

Claims 13-16, 24, 51-54 and 62 depend on either claim 1 or 39, incorporating their limitations correspondingly. Therefore, for at least the same reasons, claims 13-16, 24, 51-54 and 62 are patentable over Anwar.

Tessler does not remedy the earlier described deficiency of Anwar. Accordingly, for at least the same reasons, claims 13-16, 24, 51-54 and 62 are patentable over Anwar, even when combined with Tessler.

Claims 66-69

Claim 66 has been amended to have claims 66-69 depend from claim 39. Therefore, for at least the same reasons, claims 66-69 are patentable over any of the cited references, individually or combined.

Conclusion

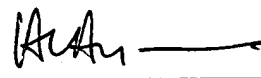
In view of the foregoing, claims 1-30 and 39-69 are in condition for allowance. Early issuance of the Notice of Allowance is earnestly solicited.

Please charge any shortages and credit any overages of payment of fees to Deposit Account No. 500393.

Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT

Dated: December 27, 2004



Al AuYeung
Reg No. 35,432

Pacwest Center, Suites 1600-1900
1211 SW Fifth Avenue
Portland, Oregon 97204
Telephone: 503-796-2437